UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF WEST VIRGINIA AT CHARLESTON

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION

Master File No. 2:12-MD-02327 MDL No. 2327

THIS DOCUMENT RELATES TO THE CASES ON THE EXHIBIT ATTACHED HERETO

JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

JOINT MOTION TO DISMISS WITH PREJUDICE

Plaintiffs, whose cases are listed on the attached Exhibit A, and Defendants, Johnson & Johnson, Ethicon, Inc., and/or Ethicon LLC (collectively, the "Ethicon Defendants"), jointly move the court to dismiss with prejudice Plaintiffs' claims against the Ethicon Defendants which were, or could have been asserted, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii). Each party shall bear her or its own costs.

Respectfully submitted,

/s/J. Mark Kell

J. Mark Kell (MO Bar #26413) Kell Lampin, LLC 14500 S. Outer Forty, Suite 407 Chesterfield, MO 63017

TEL: 636.757.1700 FAX: 636.489.3971

Email: mark.kell@kelllampinlaw.com

Counsel for Plaintiffs

/s/ William M. Gage

William M. Gage (MS Bar #8691) Butler Snow LLP 1020 Highland Colony Parkway Suite 1400 (39157) P.O. Box 6010 Ridgeland, MS 39158-6010 (601) 985-4561

william.gage@butlersnow.com

/s/ Susan M. Robinson

Susan M. Robinson (W. Va. Bar #5169) Thomas Combs & Spann PLLC 300 Summers Street Suite 1380 (25301) P.O. Box 3824

Charleston, WV 24338 (304) 414-1800 srobinson@tcspllc.com

Counsel for the Ethicon Defendants

EXHIBIT A

2:12-cv-09894	Lachcik v. Ethicon
2:13-cv-11113	Turner v. Ethicon

CERTIFICATE OF SERVICE

I certify that on this date I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/J. Mark Kell

J. Mark Kell (MO Bar #26413) Kell Lampin, LLC 14500 S. Outer Forty, Suite 407 Chesterfield, MO 63017

TEL: 636.757.1700 FAX: 636.489.3971

Email: mark.kell@kelllampinlaw.com